

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Shelia Grier,

)

**Case No. 2:22-cv-2406-RMG
(Formerly Case No.: 2022CP1002821)**

)

Plaintiffs,

)

)

v.

)

)

NOTICE OF REMOVAL

Target Corporation,

)

)

)

Defendant.

)

TO: THE UNITED STATES DISTRICT COURT:

Defendant, Target Corporation, would respectfully show the Court in support of its Notice of Removal that:

1. The Amended Summons and Complaint in this action were filed on July 26, 2022 in the Court of Common Pleas for Charleston County, South Carolina. Attached for the Court are copies of Plaintiff's Amended Summons and Complaint. The Amended Complaint is the first pleading served upon the Defendant in this action and service was affected on July 26, 2022. Therefore, removal is timely under 28 U.S.C. §1446(b).

2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina; Defendant Target Corporation is incorporated in the State of Minnesota and has its principal place of business in the State of Minnesota. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Charleston County, South Carolina.

3. Venue is proper in this matter in the Charleston Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleged suffered severe injuries to her right knee in result of the fall, negligence in failing to properly maintain areas that patrons access and utilize. Additionally, Plaintiff's attorney alleges damages exceed \$75,000.00.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Amended Complaint; however, Defendant's Answer to the Plaintiff's Amended Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Charleston County.

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.

s/Mark S. Barrow

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**ATTORNEYS FOR THE DEFENDANT
TARGET CORPORATION**

Columbia, South Carolina

July 26, 2022